

accommodation, which also has the benefit of freeing up existing stock. This position is exaggerated by the fact that the local authority are not presently building care facilities.

With a historic under-delivery, shortage of land and a likely increase in the housing target, the Council need to identify further sources of housing land to protect themselves against speculative applications. St Albans City and District Council acknowledge this and we are supportive of the pro-active response. There is no 'silver bullet' however, and a combination of sources must be considered. The Council have previously fallen short at examination stage, with St Albans arguably placing an over-reliance on large strategic sites which can destabilise the five-year housing land supply if delivery is delayed. This was a contributing factor to the recent withdrawal of the emerging Local Plan in November 2020. Moving forward, it is important that the plan looks positively at the release of a combination of small, medium and large sites where this are demonstrated 'available', 'suitable' and 'developable'.

Land to the east of Napsbury Lane is well contained, does not require the creation of 'new' boundaries, does not set the precedent for urban sprawl and does not undermine the wider Green Belt parcels role in protecting from urban sprawl and encroachment. The result is a site which we believe can deliver sufficient considerable housing numbers in addition to numerous other benefits, which on balance, allows it to be taken forward as an allocation in the next plan. Its allocation will also help to reduce the pressure to 'release' less sustainable and more rural sites for development to meet the development needs identified over the next plan period. St Albans City and District Council have previously viewed the site in a considerable light, with it only being discounted on, what we consider, an arbitrary and unjustified site size test as part of the now withdrawn Local Plan.

Withdrawal of 2018 Local Plan

In March 2019, the council submitted a Local Plan to the Planning Inspectorate that sought to boost significantly housing supply. As submitted, it would have delivered 14,608 additional homes over the period to 2036 including the release of a number of "broad locations" in the Metropolitan Green Belt. It would have delivered an average of 913 homes per annum.

The appointed Planning Inspectors did not support the Plan namely because they considered a failure on the Council's part to discharge the Duty to Cooperate and about its soundness. It was withdrawn on 23 November 2020. In addition to this, we and other planning and development professionals had also raised concern throughout the process on the over-reliance of large strategic sites to deliver the quantum of development needed over the plan period.

Green Belt

The NPPF (para 136) states that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. The Framework goes on to say (para 138):

...Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land...

Currently, 81% of the land in the district is Green Belt. There is limited land available for development and redeveloping of brownfield sites. For St Albans, the step-change in the Government's housing requirements can only be delivered through the adoption of a new Local Plan that will require the council to release Green Belt⁴.

Land to the north of Napsbury Lane has been reviewed previously as part of the Local Plan process with our client highlighting the merits of the site for development when assessed against the requirements of the Green Belt. The criteria for Green Belt land as set out in the NPPF at para 134 has been updated since the most recent Green Belt assessment (2013). However, the over-riding conclusion remains. The site has also historically been recommended for release from the Green Belt by the Local Plan Inspector in 1983 for the same reasons.

The most up-to-date Green Belt Assessment (2013) assessed the site as part of land parcel GB32. As one parcel, GB32 is ~101ha. The site which is subject to this representation makes up the west most section of the wider parcel, and less than 10% of the overall parcel.

⁴ Housing Delivery Test Action Plan (December 2020), table 4

Image 3 – Green Belt parcel ‘GB32’ [including site boundary]



Source: *Green Belt Review 2013 Land parcel 32*

When assessed as a whole parcel (a significantly larger land area than the promotion site), it was only considered to contribute to 1 of the 5 purposes of the Green Belt, to prevent neighbouring towns merging. Assessed against the other purposes, the parcel is assessed as follow:

Table 1:

<i>Green Belt Function – wider parcel GB32</i>	<i>Contribution</i>
To check the unrestricted sprawl on large built-up areas	Limited/ none
To prevent neighbouring towns from merging	Limited/ none
To assist in safeguarding the countryside from encroachment	Limited/ none
To preserve the setting and special character of historic towns	Partial
To assist in urban regeneration, by encouraging the recycling of derelict and urban land	Not assessed

Overall, the parcel is described as having a high level of built development which impacts on the levels of openness and countryside character, particularly along the A414 and surrounding the site. The land is not visually open, with views both into and out of the parcel being well screened. The character is described as “semi urban”. The land parcel did not, and does not therefore, contribute to the openness or countryside character.

However, we have undertaken an even more focussed review to assess the suitability of only the promoted land within Fairview’s’ ownership. When assessed as a smaller land parcel against the five tests, the parcel of land scores ever more poorly and, unlike the larger GB32 as a whole, plays no role in preventing the merging of towns.

Table 2:

<i>Green Belt Function – site being promoted in isolation</i>	<i>Contribution</i>
To check the unrestricted sprawl on large built-up areas – the site plays no role in restricting sprawl because is it surrounded by urban landscape on all four sides	None
To prevent neighbouring towns from merging – the site plays no role in preventing the merging of different settlements, in this instance St Albans and London Colney.	None

The parcel of open land to the south of the A414 and that which wraps around the north and east of the neighbouring nursery perform this function.	
To assist in safeguarding the countryside from encroachment - the site is completely surrounded by development with variable levels of openness. The wider area is highly urbanised, with built development along Napsbury Lane and the A414.	None
To preserve the setting and special character of historic towns – the site has no views to, from or across from the nearby Napsbury Park. The site is contained and has limited views such that it’s development would have no impact on any historic assets.	None
To assist in urban regeneration, by encouraging the recycling of derelict and urban land – the site is green field land but because of its urbanised landscape and relationship with built fabric, the conflict against this point is reduced.	Partial

With regards to preventing neighbouring towns merging, this was the only role, the parcel as a whole (GB32) was considered to play a significant role purpose because it is the primary gap between St Albans and London Colney. However, land under the control of Fairview plays no role in the separation of these settlements because it is bound almost entirely by built fabric.

In our view, the release of this modest portion of land from the Green Belt is appropriate and justified to support housing and economic growth. Given that the recycling of derelict and other urban land alone cannot deliver the development needed, further land is required and it makes sense to release land from the Green Belt which comprises characteristics of the urban landform and therefore already benefits from being well connected and served. Its release for development does not undermine the wider Green Belt parcels role in serving as Green Belt land and reducing developments on other land elsewhere in the District.

Local Character

The urban landscape surrounding the site is mixed. The housing along Napsbury Lane and London Road is semi-detached, low density suburban housing. The New House Park Housing Estate is characterised by modern, higher density housing in comparison and presents smaller units with extensive hardstanding.

Images 4-7



Aylett Nursery



Birklands open space



North Orbital Trading Estate



Napsbury Lane

At either end of the site are light industrial (North Orbital Trading Estate) and retail uses (Aylett Nursery) presenting low rise urban structures, sheds and agricultural glasshouses.

Highways & Access

The site is accessed via Napsbury Lane, which also services Aylett's Nurseries and the existing (neighbouring) houses. Fairview New Homes Ltd have rights over this access. A Technical Note has previously been prepared by TPA to consider the highways impacts associated with residential development in this location and Hertfordshire County Council have considered that the access is suitable for a comparable quantum of development with suitable mitigation. With the appropriate and suitable mitigation, the existing merge lane onto the A414 North Orbital Road at Napsbury Lane would also benefit from a scheme of improvements, improving highway safety in this location whilst presenting reasonable arrangements for the scale of the proposed development.

As part of a future allocation, the pedestrian and cycle linkages around the site perimeter and connections with the residential development to the north can also be enhanced, bolstering the site's connectivity with the existing settlement, and supporting foot borne and public transport linkages with the town centre and other services & facilities to the north. Bus stops in both directions on London Road are less than 400m away.

The site's existing connectivity with the surrounding area has been outlined under the appropriate sub-heading, but for avoidance of doubt, the A414 North Orbital Road from which the site is served (via Napsbury Lane) to the south provides direct access to the wider area including St Albans and London Colney, as well as regional road networks, with junctions to the M25 (junctions 21/22) and M1 less than 5km away.

Flood Risk & Drainage

The site is located within flood zone 1 (low risk of flooding) where residential development is sequentially preferable. SUDs and other drainage techniques can be brought forward as part of development proposals pursuant to a future allocation.

Ecology & Trees

The site has no statutory ecological designations. The northern part of the site is a Local Wildlife Site (Ref: 68/051), as is the adjacent Birklands Park (Ref: 68/064). However, these do not need to be negatively impacted by development of the site. The site itself has no constraints which preclude development subject to the appropriate ecology & biodiversity assessments and any recommended mitigation measures being implemented, including the protection of enhancement the existing natural features.

The site contains a number of protected trees and groups of trees. These are focussed in five groups to the site's western boundary, north west boundary corner, north east boundary and south west corners. They are predominantly Oak, Birch and Ash trees.

Image 8 – Protected Trees on site



Source: St Albans Council Local Information Mapping Service (trees)

The trees help to create a screen between the site and surrounding residential and employment uses and helps to define the site's parcel, in addition to helping mitigate any visual impacts that accrue from the development of the site - which are already significantly diminished because of how contained the site is and the urbanising features which exist.

Future development can be accommodated whilst protecting and, where possible, enhancing the existing trees and planting on site.

Landscape character and views

The site is relatively flat and almost totally enclosed – with very few views either into or out of the site. Screening from adjacent development is provided by the existing planting along its boundaries, except for the short border with Ayletts Nursery. A straight line of trees and shrubs also creates division through the centre of the site in a north-south direction.

The surrounding area is urbanised and is not considered to be a landscape of high quality. The 2009 SHLAA Panel noted that “Housing development [on this site] would be fairly well related to the existing built up area.”

Heritage & Conservation

The site is not in a Conservation Area, nor are there any Listed Buildings in close proximity to the site which would be impacted by future development of the site.

Topography

Land within Fairview's control is relatively flat and poses no significant barriers to development. Its development does not require significant cut & fill exercises.

Public Rights of Way

Registered footpaths run around the site perimeter (ref: 98, 99, 100 and 1011) with opportunities for foot borne entry and exit from Napsbury Lane along the south and west border, and The Firs to the north which provides direct connectivity to the housing development to the north. A registered bridleway (ref: 58) runs along the site west border and connects to New House Park and the wider settlement to north and north-east. These can all be retained and enhanced as part of a future allocation.

Other

The site is not located in any recognised coal mining area. The site is not located within an Air Quality Management Area (AQMA). The site has no records with regards to archaeological interests.

Future proposals can be fully policy compliant, including in respect of affordable housing requirements and through the effective use of energy & sustainability and ecology & biodiversity initiatives to minimise the development's carbon footprint and take advantage of options to improve and manage the sites value to local flora & fauna.

Concept Masterplan

This representation is accompanied by a concept masterplan (and extract below) prepared by Fairview New Homes Ltd and with input from Planning Potential.

Whilst it serves as an indicative tool only, the masterplan shows how the quantum of development can easily be accommodated on site whilst protecting those recognised features of merit. These include the trees along much of the site boundary and those which extend into site towards the south west corner (below the indicative later living component) and the public footpaths which form a key part of the proposals. These paths will be improved as part of future development, increasing the role they play in providing public benefit to the surrounding area. The masterplan also helps to demonstrate how contained the site is and how the wider parcel of Green Belt land (*Image 3*) is not undermined by this modest portion of land being released for development.

The density and form of development is intended to reflect that of the adjoining residential estates and the character of the surrounding area. Housing will be predominantly low-rise (2 storey houses/ 3 storey apartment block/ 3 storey later living facility). Spaces will be provided for car parking and for amenity space in line with local guidance and consistent with the wider character of the area whilst respecting the natural features and boundaries. At the same time, a comprehensive scheme will be entirely policy compliant.

Image 9 – Concept Masterplan



Source: *Fairview Homes (February 2021)*

The proposed quantum of development is based on initial capacity testing which suggest that approximately 150 units and 110 bed later living facility (or similar) can be accommodated on site without requiring significant and/ or disruptive infrastructure works.

The south west portion of the site will be left undeveloped with initiatives explored as to how to protect and enhance biodiversity on the site and provide open play space.

Available

The availability of the site is assessed in terms of site ownership. The site is in single ownership by Fairview New Homes Ltd, who are committed to the active promotion of the parcel of land. Fairview are an established and recognised house builder with a proven track record of delivery in the home counties.

Residential development with a focus also on the enhancement of the landscape, boundary and biodiversity features is capable of delivery within the short term. The site could have product within 24 months of receiving planning permission – and is deliverable in its entirety within 5 years of that date.

Suitable

In addition to adjoining the built fabric on all sides, the A414 which serves as a significant physical barrier such that any merging with the built fabric to the south is not possible, the site's shape, containment and accessibility lend itself to residential development by way of logical in-filling/ rounding off of the settlement, without undermining the role the wider parcel of land plays in preventing urban sprawl.

At 10ha in size, the development of 150 units and a 110 bed later living facility represents a suitable and appropriate development density and ensures key features can be retained and incorporated in the scheme. This includes protecting and enhancing the sites contribution towards public enjoyment and biodiversity through the maintenance of improved footpaths and public open space.

The site is located in Flood Zone 1 where residential development is considered acceptable and the site is not in a Conservation Area, nor are there any Listed Buildings in close proximity. The planning and community benefits accruing from the site's development for residential uses, more than outweigh the loss of this modest parcel of poorly performing Green Belt land, and any perceived impact of the site's development.

Fairview Homes have previously highlighted the site as a developable residential opportunity as part of the Local Plan process and the vision for the site has evolved to now include the delivery of an care living facility (or similar) for which we believe an identified need exists. The site's inclusion in the new Local Plan also reduces the reliance of larger more strategic sites to deliver the identified housing need over the plan period, or other windfall sites which do not relate as well to the existing built fabric compared to the site promoted. This is particularly important following previous concerns raised about the Local Authority placing too much emphasis on larger sites without any justification. The benefit of including a proportion of 'small and medium sized sites' sites is acknowledged as they are less likely to destabilise land supply figures should there be delays in these coming forward. The NPPF crystallizes this at paragraph 68.

Developable

The NPPF states that to be considered developable sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

It is considered that the site promoted as part of this call for sites update is a developable opportunity for housing and economic growth. Development on this plot of land would contribute towards housing delivery and represents efficient and effective use of appropriate well contained land without putting unnecessary development pressures on land that relates less well with the existing settlement and main highway links.

The development of the site for residential use would contribute to the existing vibrant and healthy community by providing a mixture of properties including affordable housing provision. The scale, nature and setting of the site is attractive to Fairview Homes, who have a track record of delivery across the South East, including a development approved at Harpenden in 2016 (Ref: 5/2016/0669/SSM).

Conclusion and Next Steps

We support the Council's approach towards identifying and considering sites for inclusion within their new Local Plan as part of the current call for sites exercise. This will almost certainly include the release of most suitable sites from the Green Belt to help identify and deliver a sufficient supply of housing over the new plan period.

Land to the east of Napsbury Lane, St Albans is a contained site, surrounded by built fabric in a highly sustainable location towards the southern edge of St Albans, with good access to key transport hubs and to local services. The site is subject to significant urbanising influence such that its development need not undermine the wider setting & landscape.

The site, in isolation, performs no Green Belt function and can be released without harm to the remaining Green Belt. The site is immediately available and Fairview New Homes Ltd as the owner are committed to promoting its release for residential development with a view to bringing it forward in the short term. Development would bring new housing and affordable homes to the area, as well as the delivery of a later living facility, alongside improvements to the quality and accessibility of the existing natural open space. The scheme can and will be entirely policy compliant.

The delivery of new homes and living accommodation will deliver a host of benefits of which will outweigh the impact of releasing the site for development. Previous Local Plan Inspectors have recommended this site for release of housing and following more recent positive assessments and the wider housing scenario facing St Albans City and District Council, there is no reason why the site should not be considered favourably and taken forward as part of the Local Plan process.

As a follow up to this formal submission, we would be delighted to meet with the Local Plan team to discuss the site in further detail and explore opportunities to ensure the site is taken forward. In the background, Fairview and Planning Potential will continue to assess the technical aspects of the site, including highways & access and ecology & biodiversity considerations. We also welcome the Council's views on the suitability and scope of the now proposed later living facility.





Land between Bedmond Lane and Mayne Avenue

Call for Sites response – March 2021

Residential development for approximately 100 dwellings (including 50% affordable housing) with associated access and open space

DLA Ref: 21/010
March 2021

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1.0 INTRODUCTION

1.1 This report is submitted in response to the Call for Sites on behalf of the owner of the land between Mayne Avenue and Bedmond Lane. The site is being promoted for residential development.

1.2 There is an evident and urgent need for additional housing sites within St Albans district. A greater emphasis on small and medium-sized sites is needed to ensure a balanced portfolio and provide a more robust and resilient housing land supply. The Council's new Green Belt Review will therefore need to assess the specific Green Belt impact arising from potential development sites, rather than the previous broad-brush assessment.

1.3 St Albans is the largest town in the district and is clearly a sustainable location for growth. The report site is well located in relation to key services and facilities and is within walking distance of schools, shops, health and leisure facilities. It lies around 200m from a bus stop and 1.9km from the railway station.

1.4 The site adjoins built development and would form a logical small-scale extension to the city. The site will not extend the built development of St Albans unduly and will not cause coalescence in any form.

1.5 Critically, the site offers up a substantial area of land south of the proposed development that will remain in the Green Belt and would be made available as public open space and could be used for tree planting and ecological enhancements. The community benefit of this element of the proposal offsets the impact of development on the Green Belt and reflects the guidance in national policy regarding developments delivering improvements to remaining Green Belt.

1.6 There are no other constraints that would prevent development.

1.7 The site is in single ownership and could be brought forward for development quickly. There are no 'ransom strips' present and the development is not dependent upon overcoming any constraints, including the need to deliver significant infrastructure. This is particularly important given the urgency of the housing need and the time needed for strategic sites to deliver on the ground.

1.8 The northern part of the site should be allocated for housing and removed from the Green Belt in the next iteration of the Local Plan.

2.0 SITE & CONTEXT ANALYSIS

2.1 Location

The site, shown below in Figure 1, is located on the western edge of St Albans. To the north of the site is the Hemel Hempstead Road, which links the town of Hemel Hempstead to St Albans, with Bedmond Lane running to the west of the site. Beyond these two roads are open fields. To the south and to the east of the site is residential housing.



Figure 1 - Site location

2.2 Context and land uses

This comprises a broadly rectangular shaped parcel of land of some 5.5ha. The site is currently scrubland with no development on it.

2.3 Access

There is existing vehicular access from Bedmond Lane, but access is also available from Parklands Drive and Mayne Avenue.

2.4 Development Plan Notation

The Proposals Map for St Albans District Council in Figure 2 below, shows the site is adjacent to the settlement boundary of St Albans and sits within the Green Belt. There are a number of trees within the site that are subject to Tree Preservation Orders, specifically, a group of trees on the western boundary of the site and a group on the Mayne Avenue boundary.

2.5 Local services

The site enjoys excellent access to a range of local services and facilities. As detailed below, the majority of these services are located within 2km of the site.

Table 2.5: Summary of Local Services (approximate measurements)

Facility	Local Provision	Proximity to site – km (miles)
Education	Prae Wood Primary school	0.50 (0.31)
	Abbey View Nursery and Pre-School	2.20 (1.36)
	The Marlborough Science Academy	1.80 (1.11)
Retail	Waitrose	0.35 (0.21)
	Abbey View Retail Park	2.00 (1.24)
	Vesta Avenue Shops	2.20 (1.36)
Health	Avicenna Pharmacy	0.35 (0.21)
	Midway Surgery	2.30 (1.42)
	Family Dental Practice	2.20 (1.36)
Leisure	Verulam Park	0.60 (0.37)
	Westminster Lodge Leisure Centre	1.90 (1.18)
	Model Boating Lake	1..10 (0.68)

St Albans Abbey Railway Station is located some 1.9km from the site, providing frequent services to Watford and London Euston to the south and Luton Airport, Luton and Bedford to the north.

2.6 Public Transport

The nearest bus stops are located on Mayne Avenue and Augustus Close, both of which are within 200m of the centre of the site. These bus stops are served by the 300, 301, S7, S8, and S9 buses which run regular services to nearby towns including Stevenage, Hatfield, Welwyn Garden City, and Hemel Hempstead.

3.0 STRATEGIC CONTEXT

3.1 This Call for Sites opportunity marks the start of a new Local Plan process. With the withdrawal of the draft Local Plan in 2020 following the withdrawal of the Strategic Local Plan in 2017, the need for an up-to-date strategic framework for development is more urgent than ever.

3.2 The objectively assessed housing need for St Albans district is around 900 dwellings per year. This should be the starting point. However, the Council will also be aware of neighbouring authorities that are struggling to meet their own housing requirements. The Council will need to have open and constructive dialogue with these authorities if it is to satisfy the Duty to Cooperate. The potential for St Albans district to assist with meeting housing needs from surrounding areas should not be dismissed at this stage. There is considerable development potential within the district, partly stemming from the fact that Green Belt boundaries have not been properly reviewed for around 35 years. The Council should not see the 900 homes per year target as a ceiling if greater potential emerges through the Green Belt review or other evidence.

Housing need

3.3 The reliance on a Local Plan adopted in 1994 and the housing policies and land allocations therein has had a catastrophic effect on housing delivery within the district. With an annual housing target of around 900 homes per year and annual housing completions since 2001 running at 376 homes per year, a whole generation of young people have been largely unable to access the housing market. Recent performance can be judged by the latest Housing Delivery Test results for St Albans District (published in February 2021), which indicated a HDT measurement of only 63% for the period 2017/18 to 2019/20 – the 33rd worst of the 298 local authorities in England.

3.4 While housing completions have, to a degree, been propped up by recent changes to permitted development rights, these have not had an impact on the delivery of affordable housing. The target of 200 affordable homes per year from the 1994 Local Plan has not been met. Since 1994, 1,826 affordable homes have been delivered, against a target of 5,200 – only 34% of the target and a shortfall of 3,374 affordable homes. In 2019/20, only 31 affordable homes were completed – just 7% of total completions.

3.5 The problem is even more acute in terms of the delivery of the most affordable type of property as the provision of social rented property in the district has become more and more difficult. In

the monitoring year 2019/20, only 7 social rented dwellings were completed (1.5% of all dwellings completed). The economics of brownfield redevelopment, the lack of greenfield opportunities and the emphasis on affordable rent have all combined to severely restrict the provision of affordable housing for those least able to afford it.

- 3.6 The delivery of a new Local Plan with updated housing targets, new housing allocations and new Green Belt releases is of the utmost importance for the district.

The portfolio of housing sites

- 3.7 To meet housing need will require the delivery of a mixed portfolio of housing sites. A range of sizes, types and locations will be needed to enable a wide range of housebuilding organisations to contribute to meeting needs, including arrangements for self-build properties.
- 3.8 The previous focus only on strategic sites of 500 dwellings or more must change. As highlighted by the Inspectors examining the now-withdrawn draft Local Plan, and as recognised by the Council's Planning Portfolio holder, small and medium-sized sites within the Green Belt must be seriously considered.

Green Belt considerations

- 3.9 The Council's Green Belt review from 2012 provides a useful starting point but is in no way adequate to support a new Local Plan. The focus on strategic sites must change and the Green Belt review must look at the site-specific impacts of proposed development sites. The broad-brush, coarse-grain approach to assessing parcels of Green Belt land in the 2012 Review must be developed into a more sophisticated and nuanced review of development potential. This will include both strategic and smaller-scale housing and employment sites.

4.0 PLANNING HISTORY

- 4.1 While the site has a fairly extensive recent planning history, these applications and appeals relate to the use of the site for the grazing of a horse. On this basis, they have little relevance for the consideration of the site as a potential housing allocation and Green Belt release.

5.0 PREVIOUS SHLAA ASSESSMENT

5.1 This site has been submitted through previous Call for Sites invitations and was assessed in the 2009 SHLAA under the reference no. SHLAA-GB-SA-126. The conclusion in relation to this site was as follows:

Should the site be given further consideration for housing development?

Yes. Visual impact and views towards St Albans are key concerns. However, screening and the TPO areas could be retained and improved along the western boundary to provide a landscape buffer, leaving the majority of the north of the site available for development. Public footpaths could also be incorporated into any proposal for the development of the site. Whilst it is felt that this site could have some development potential and should be given further consideration for housing, the scale of development proposed by the agent would not be acceptable.

5.2 The Council's 2009 SHLAA concluded that the site would have a capacity for circa 110 dwellings.

5.3 The SHLAA was subject to a limited update in 2016. Table 3 of the 2016 SHLAA summarised the Council's view on capacity and concluded in respect of this site that it should be rejected.

However, no detailed assessment was made available to substantiate that conclusion. Completed site assessment proformas were made available for some sites but nothing was published for the report site. It is therefore not at all clear what had changed to reverse the Council's 2009 conclusion.

5.4 It is also important to note that the Council's 2016 SHLAA conclusions were reached in the context of a draft Local Plan promoting 436 dwellings per year. The target now required from the draft Local Plan is 900 homes per year, meaning sites that were previously rejected must now be revisited.

6.0 **SITE CONSTRAINTS**

6.1 The Council's Call for Sites 2021 pro forma seeks information on any constraints affecting potential sites. While the constraints applying to this site are discussed throughout this report, the information is summarised here in the same format as requested on the pro forma, for ease of reference.

6.2 **Contamination/Pollution**

No suspected issues of contamination or pollution that would preclude development.

6.3 **Environmental issues**

No significant environmental constraints other than the site is located within the Green Belt.

6.4 **Flood risk**

The site is located within Flood Zone 1 and therefore is at very low risk of flooding.

6.5 **Topography**

The site is essentially level such that large amounts of spoil would not need to be removed.

6.6 **Utility services**

It is likely that utilities are available to the neighbouring residential dwellings to the south east of the site to which a connection could easily be made.

6.7 **Legal issues**

The site is in single ownership and could be brought forward for development quickly. There are no 'ransom strips' present.

6.8 **Access**

The proposed site layout shows that access can be achieved off the public highway from Parklands Drive.

7.0 OUTLINE OF PROPOSAL

Use & Amount

7.1 The site is proposed for a mix of housing and open space. The housing development is generally focused on the part of the site to the north of the public footpath, with open space on the southern part. The indicative concept plan shown in Figure 2 below provides for a net developable area of around 2.6ha, consisting of approximately 100 dwellings. Of these 100 dwellings, half will be designated as affordable housing with a tenure mix of 60% social rent and 40% shared ownership.

Appearance & Scale

7.2 The proposed dwelling mix is indicative at this stage and will be finalised at application stage. However, in order to give the Council confidence on the delivery of affordable housing, the affordable element has been agreed between CALA Homes and Hightown Housing Association. Overall, 50% of the 100 homes provided on site will be affordable. Of these 50 homes, 60% (30 homes) will be for social rent and 40% (20 homes) will be shared ownership. To put this into context, 30 social rented properties equates to more than four times what was delivered in the district as a whole in 2019/20. This should attract substantial weight in support of the allocation.

7.3 In relation to affordable unit types, it is envisaged that the development would include a mix of affordable units from one and two bed flats through to two, three and four bedroom houses, especially for the rented units. For the shared ownership properties, due to the high values in St Albans, these would be focused on the smaller properties, flats and two bedroom houses, and a very limited provision of three bedroom houses. Four bedroom houses for shared ownership are likely to be too expensive for purchasers, even on small initial percentage shares, and are therefore not proposed.

7.4 In terms of the market units, the following mix is envisaged:

- 2 x 1 bedroom apartments
- 6 x 2 bedroom apartments
- 2 x 2 bedroom houses
- 24 x 3 bedroom houses
- 16 x 4 bedroom houses

Figure 2: Indicative development concept



The drawing is intended as an indicative concept and does not constitute a contract or any other legal document. It is not intended to be used for any other purpose than the one stated here. The drawing is not intended to be used for any other purpose than the one stated here. The drawing is not intended to be used for any other purpose than the one stated here.

Check all dimensions on site before each process or material are ordered. Check all dimensions on site before each process or material are ordered. Check all dimensions on site before each process or material are ordered.

NO. DESCRIPTION DATE AUTHOR DWG

- Key:
- Landscape buffer
 - Protected Tree Groups



Master Plan 1:1000
 CALA Homes, Bedmond Lane Fields, St. Albans, Hertfordshire



PRELIMINARY

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The location is:

Landscaping

- 7.5 There is a number of trees within the site that are subject to Tree Preservation Orders, as explained in Figure 2. Specifically, a group of trees on the western boundary of the site and a group on the Mayne Avenue boundary. These trees will be incorporated into the development and are shown as retained on the concept plan shown at Figure 2. Any detailed landscaping plans would be incorporated at application stage.

Access

- 7.6 Vehicular access would be taken from Parklands Drive where sufficient visibility can be achieved, both at the proposed junction with Parklands Drive and the junction of Parkland Drive with Mayne Avenue.

Open space provision

- 7.7 The concept plan provides for a new area of publicly accessible open space created in the southern part of the site. There is currently no authorised access to the site, other than across the defined public footpaths. Any use of or access to the site outside of these footpaths is illegal and constitutes trespass.
- 7.8 This part of St Albans has been highlighted as an area of need in terms of open space provision. Technical work undertaken by the Council in 2016 in connection with the Detailed Local Plan

illustrated the availability of open space in St Albans, as shown in Figure 3 below. While Verulamium Park provides access to higher-level greenspace, there appears to be no amenity greenspace within the residential area south of King Harry Lane. Amenity greenspace is valuable as it provides more immediate access to residents without having to travel or walk longer distances.

- 7.9 The provision of amenity greenspace at the report site would address an area of need identified in the Council's evidence base. The need for additional greenspace in this area is also reflected in the numerous attempts to unlawfully access the report site for dog walking and informal recreation. Opening up the southern part of the site for recreational use should therefore attract substantial weight in support of the allocation.

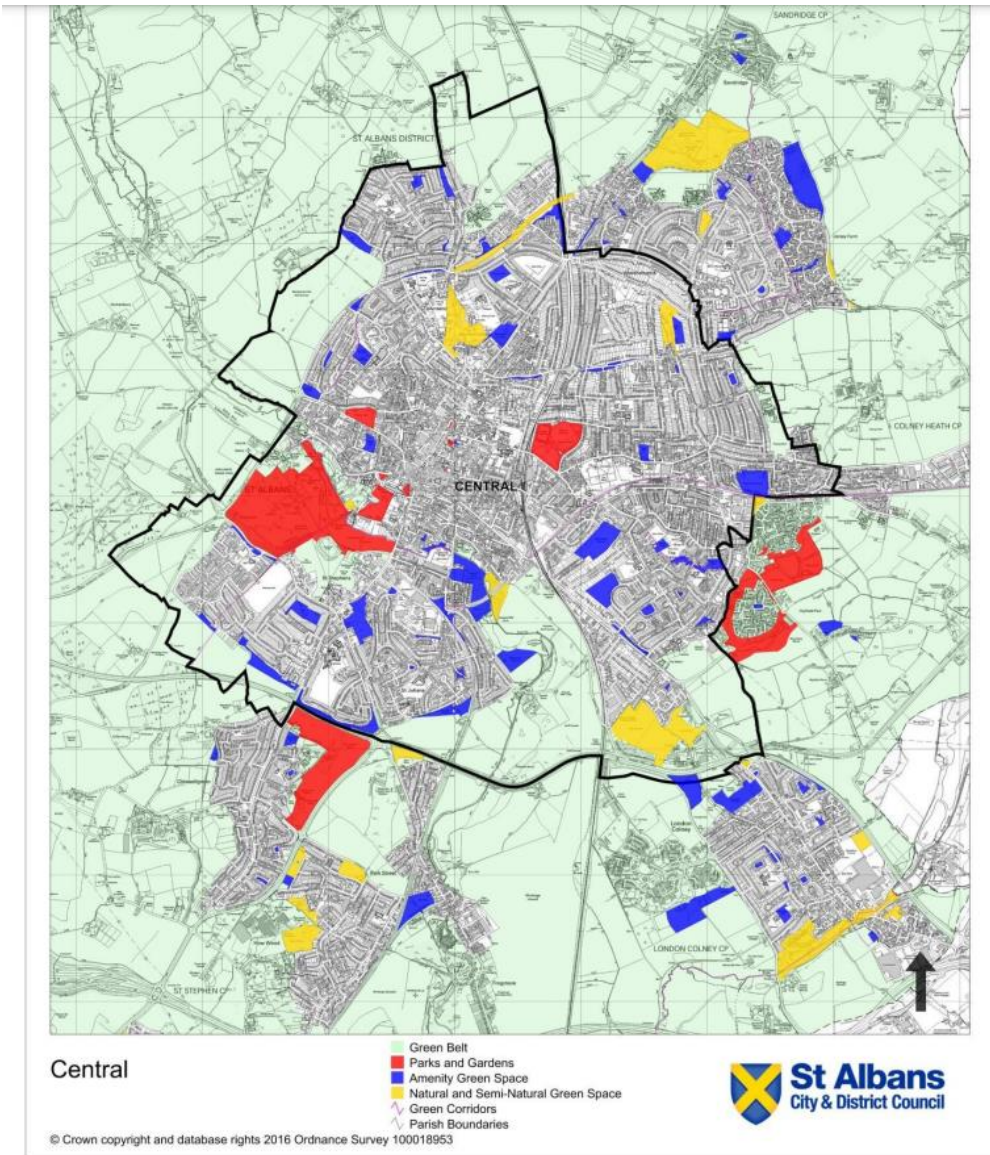


Figure 3: greenspace provision in St Albans

8.0 GREEN BELT IMPACT

8.1 Paragraph 134 of the NPPF states that the Green Belt serves five purposes. These five purposes have been set out below with an assessment on the site's contributions to each purpose.

8.2 **Purpose 1 - to check the unrestricted sprawl of large built-up areas**

The SKM Green Belt Review acknowledges that the parcel of land makes limited or no contribution to preventing the sprawl of large built-up areas (London, Luton, Dunstable and Stevenage).

8.3 **Purpose 2 – to prevent neighbouring towns merging into one another.**

While the wider parcel of land performs a role in keeping St Albans and Hemel Hempstead separate, this specific site would not actually narrow the gap between the two settlements, given the orientation of existing development (see Figure 4 below). The size of the proposed site is also small compared with the overall gap.

8.4 The Council's consultants evidently came to the same conclusion and stated: *“any minor reduction in the gap would be unlikely to compromise the separation of settlements in physical or visual terms, or the overall level of visual openness.”*

8.5 This finding is critical in terms of the way the SKM Green Belt Review is used in the assessment of individual sites. While the parcel as a whole may make a significant contribution, there are individual areas within the parcel that make a lesser contribution and might be released without compromising Green Belt purposes. The SKM findings need to be treated as strategic-level conclusions and not an exhaustive search of all sites that could be released from the Green Belt.



Figure 4 - Gap between St Albans and Hemel Hempstead

8.6 **Purpose 3 – to assist in safeguarding the countryside from encroachment.**

The key difference between the report site and the wider parcel is the degree of urban influence. The site lies adjacent to the built-up area and has the appearance and nature of an urban fringe site. The line of Bedmond Lane to the west and the mature tree belt along its outer boundary effectively separates the site from the wider countryside.

8.7 **Purpose 4 – to preserve the setting and special character of historic towns.**

Verulamium Park lies to the north of the report site, with the cathedral beyond. However, given the existing development, particularly Parklands Drive, there is only a weak relationship between the site and these features, confined to the north of the site. Subject to sensitive design of the scheme in this northern area, there is no reason why this site could not be released from the Green Belt.

8.8 **Purpose 5 – to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.**

It is a common assumption that all Green Belt land within the District makes a significant contribution to this purpose.

8.9 **Summary of harm to Green Belt**

Paragraph 133 of the NPPF stipulates that *“the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”*. Thus, whilst openness is an essential characteristic, in assessing its importance this cannot be divorced from the overriding aim of preventing urban sprawl. This notion is supported by paragraph 139 of the Framework, with regard to Green Belt boundaries. This states that when defining boundaries, local planning authorities should, inter alia, *“not include land which it is unnecessary to keep permanently open”*. As such, it is considered that the harm would be very limited for the following reasons:

- The extent of built development is restricted to that adjacent to the current built-up edge of the city.
- A substantial area of land south of the proposed development would be made available as public open space and used for tree planting and ecological enhancements. This reflects the guidance in the NPPF paragraph 138 that seeks any Green Belt impact to be *“offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.”* The proposal represents exactly the sort of scheme envisaged by government policy.

8.10 New position of Green Belt boundary

The current position of the Green Belt boundary as defined in the 1994 Local Plan is shown on Figure 5 below, together with the part of the report site proposed to be removed from the Green Belt outlined in black.

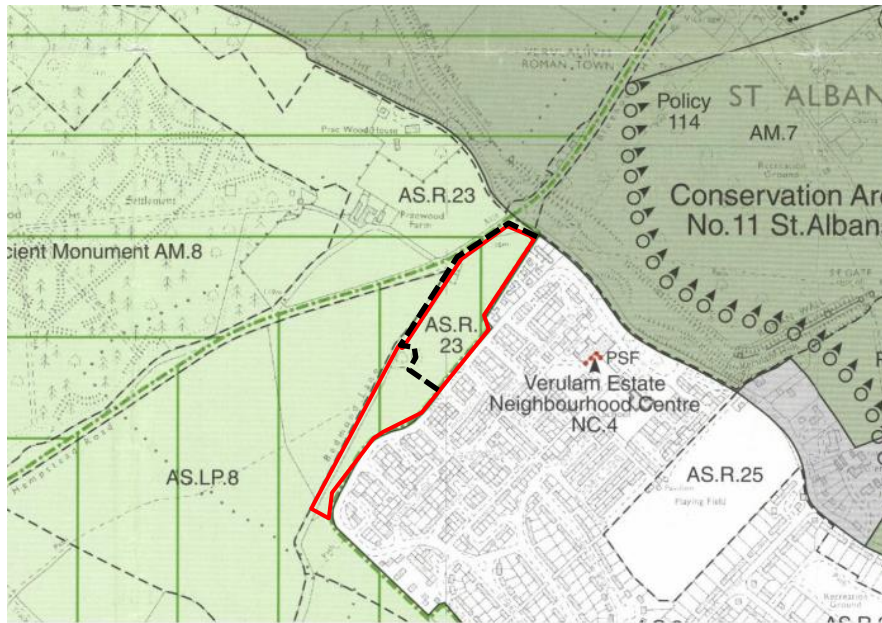


Figure 5: Proposed Green Belt boundary change (black dashed line)

9.0 CONCLUSIONS

- 9.1 There is an evident and urgent need for additional housing sites within St Albans district. A greater emphasis on small and medium-sized sites is needed to ensure a balanced portfolio and provide a more robust and resilient housing land supply. The Council's new Green Belt Review will therefore need to assess the specific Green Belt impact arising from potential development sites, rather than the previous broad-brush assessment.
- 9.2 St Albans is the largest town in the district and is clearly a sustainable location for growth. The report site is well located in relation to key services and facilities and is within walking distance of schools, shops, health and leisure facilities. It lies around 200m from a bus stop and 1.9km from the railway station.
- 9.3 The site adjoins built development and would form a logical small-scale extension to the city. The site will not extend the built development of St Albans unduly and will not cause coalescence in any form.
- 9.4 Critically, the site offers up a substantial area of land south of the proposed development that will remain in the Green Belt and would be made available as public open space and could be used for tree planting and ecological enhancements. The community benefit of this element of the proposal offsets the impact of

development on the Green Belt and reflects the guidance in national policy regarding developments delivering improvements to remaining Green Belt.

- 9.5 There are no other constraints that would prevent development.
- 9.6 The site is in single ownership and could be brought forward for development quickly. There are no 'ransom strips' present and the development is not dependent upon overcoming any constraints, including the need to deliver significant infrastructure. This is particularly important given the urgency of the housing need and the time needed for strategic sites to deliver on the ground.
- 9.7 The northern part of the site should be allocated for housing and removed from the Green Belt in the next iteration of the Local Plan.